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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

In re DMCA Subpoena to) Case No: 3:22-mc-80092
YouTube, LLC) **DECLARATION OF HIROYUKI**
) **NAKAJIMA**
)
_____)

I, Hiroyuki Nakajima, declare and testify as follows:

1. I am an attorney duly licensed to practice law in Japan. I represent KADOKAWA CORPORATION, a Japanese corporation, in the above-entitled proceeding and as such, I am authorized and qualified to make this declaration for and on its behalf, and I make this declaration for that reason.

2. KADOKAWA CORPORATION is seeking a subpoena pursuant to 17 U.S.C. § 512(h) to obtain information sufficient to identify the persons infringing its copyrighted works.

3. The purpose for which this subpoena is sought is to obtain the identity of the alleged infringers. Such information will only be used for the purpose of protecting rights under the Copyright Act (17 U.S.C. § 101, et seq.).

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct.

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4 Executed on April 6, 2022.

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6 Hiroyuki Nakajima
7 Hiroyuki Nakajima
8 Attorney for KADOKAWA CORPORATION
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